

REMARKS

In the Office Action, claims 1-3 and 5-38 were rejected. Reconsideration and allowance of all pending claims are requested.

Rejections under 35 USC § 102

Claims 1-6 were rejected under 35 U.S.C 102(e) as being anticipated by U.S. Patent No. 2003/0106039 (hereinafter "Rosnow").

Claim 1 recites a system for performing synchronous quality function deployment (QFD) over a computer network. The computer network includes a real-time server, a lightweight thin client server, a data storage device, and at least two client systems. The system comprises a QFD tool. The QFD tool includes a "Create New QFD" session component and an "Active QFD session" component. The active QFD session component provides a *common area operable for facilitating collaboration among session members* via computer screens of the at least two client systems. The QFD tool further includes a "Finished QFD session" component and a "Scheduled QFD session" component. The lightweight thin client server executes the QFD tool and the at least two client systems access the QFD tool in real time via the real-time server.

The Examiner indicated that similar steps or components were present in Rosnow. However, Rosnow does not anticipate the system of claim 1 for at least the reasons set forth below.

Rosnow lacks an active session component with a common area for collaboration.

Claim 1 recites that the active QFD session component provides a common area operable for facilitating collaboration among session members via computer screens of at least two client systems. At least these recitations are not taught by Rosnow.

Rosnow discloses a computer-implemented system and method for evaluating, planning and implementing a project from conceptualization to market introduction. The Examiner contended that Rosnow discloses an active QFD session component providing common area operable for facilitating collaboration among session members via computer screens of at least two client systems. In formulating a rejection of this feature, the Examiner referred to figures 7 and 8; page 1, paragraph 4; and page 6, paragraph 56 of Rosnow. Applicants have carefully reviewed these sections and submit that these sections, and indeed the reference as a whole, fails to teach or disclose an active QFD session component providing any kind of collaborative environment or common area.

Specifically, at page 1 paragraph 4, Rosnow discloses the need for an automated system for enhanced document and file management, and idea development. In addition, this section discloses the need for a development system that is more flexible and customizable to permit changes to be made during the life cycle of a project.

In addition, specifically, at page 6 paragraph 56, Rosnow states:

The Lotus Workflow 403 is a stand alone product that works on top of Domino and provides users the ability to develop, manage, and monitor business processes and help them eliminate the downfalls of paper-based work. Lotus Workflow includes several major bundled components, discussed below.

Clearly, the above sections in no way relate to an active QFD session component providing a common area operable for facilitating collaboration among session members via computer screens of at least two client systems. The common area disclosed in the present patent application permits collaboration between multiple users that is facilitated by the fact that the QFD tool executes on the thin client server, while the client systems access the QFD tool in real time via the real time server. This is not taught by Rosnow.

In addition, even if Rosnow did provide an area for project team members to *monitor* tasks, Rosnow does not disclose *an active QFD session component providing a common area*, wherein the common area facilitates collaboration among session members via computer screens of said at least two client systems.

Because Rosnow does not disclose at least, an active QFD session component providing a common area operable for facilitating collaboration among session members via computer screens of at least two client systems, the reference cannot anticipate claim 1. Accordingly, claims 1 and the claims depending therefrom are believed to be clearly patentable over Rosnow as well as other prior art of record.

Rejections Under 35 U.S.C. § 103

Claims 7, 12-14 were rejected under 35 U.S.C. 103(a) as being unpatentable over Rosnow in view of U.S Patent No. 2003/0055897 (hereinafter "Brown").

Claims 8-11, 15-26 and 27-38 were rejected under 35 U.S.C. 103(a) as being unpatentable over Rosnow, in view of Brown and further in view of U.S Patent No. 6,301,516 B1 (hereinafter "Ostrowski").

Ostrowski and Brown were not cited by the Examiner to disclose an active QFD session providing a common area operable for facilitating collaboration among session members via computer screens of said at least two client systems. In addition, the Examiner indicated in the Response to Arguments section that Ostrowski was not relied upon to overcome this feature.

Applicants have reviewed the Ostrowski and Brown references and submit that these references fail to disclose an active QFD session providing a common area operable for facilitating collaboration among session members via computer screens of said at least two client systems.

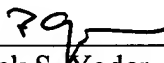
In view of the foregoing deficiencies in the teachings of the prior art, the references cannot establish a *prima facie* case of obviousness of claims 7, 12-14 and 8-11, 15-26 and 27-38. Accordingly, these claims are believed to be clearly patentable over the cited combination. Their reconsideration and allowance are respectfully requested.

Conclusion

In view of the remarks and amendments set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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